IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

JAMES HAYES and DEBERA GRANT,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	**Civil Action No.: 3:14-cv-258-JAG**
	)	
DELBERT SERVICES CORPORATION,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

DEFENDANT DELBERT SERVICES CORPORATION'S
MOTION TO DISMISS, OR, ALTERNATIVELY, TO COMPEL ARBITRATION

Defendant Delbert Services Corporation ("Delbert") respectfully moves this Court to: (1) dismiss this case under the doctrine of *forum non conveniens* pursuant to Plaintiffs' loan agreements' forum-selection clause; (2) dismiss or stay this case under the tribal exhaustion doctrine; or (3) compel arbitration and dismiss or stay this case. In support of this Motion, Delbert relies upon the arguments and supporting authorities set forth in its contemporaneously filed Memorandum of Law in Support of Delbert Services Corporation's Motion to Dismiss, or, Alternatively, to Compel Arbitration.

Dated: May 29, 2014

JENNER & BLOCK LLP

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May, 2014, I served a copy of the foregoing **DELBERT SERVICES CORPORATION'S MOTION TO DISMISS, OR, ALTERNATIVELY, TO COMPEL ARBITRATION** via the Court's electronic filing system, which will automatically send email notification of such filing to the following counsel of record:

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